

## Mining Remedial Recovery Company

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Rick Woodard  
CALFED Bay-Delta Program  
1416 Ninth Street  
Sacramento, CA 95814

Dear Rick,

I appreciate the opportunity to comment on the draft *Priority Water Quality Subject Areas and Recommended Selection Criteria for Early Project Proposals for Ecosystem Restoration*. My recommendations are limited to the criteria related to acid mine drainage. I trust that the Water Quality Program Team will give the following comments careful consideration.

The proposed Water Quality Subject Area #4 targets copper, zinc, and cadmium loads to the Sacramento River above Hamilton City from abandoned and inactive mines. Projects designed to reduce metal loads from mine sites located in the upper Sacramento River watershed would meet the proposed project selection criteria, with one critical exception. The Water Quality Program recommends rejecting proposals that would achieve corrective actions required of responsible parties as a result of regulatory or legal requirements. **At least 97% of the copper, cadmium, and zinc load to the Sacramento River watershed upstream of Hamilton City drains from inactive mine sites subject to regulatory or legal requirements.** (Please see the attached table.)

Disqualifying inactive mine remediation project proposals will prevent the CALFED Program from achieving water quality objectives for cadmium, copper, and zinc. Please reconsider using this criteria as it effectively counteracts a proposed priority water quality action. Instead, CALFED could require that responsible parties share the cost of proposed projects. Mine remediation projects could generate a significant *quantity of water quality benefits* per CALFED dollar spent. I strongly advise the CALFED Water Quality Program to rethink this criteria.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Linda Mercurio', written in black ink.

Linda Mercurio